

Angela M. Taylor (CA Bar No. 210425)
angelataylor@jonesday.com
Eric J. Hardeman (SBN 253489)
ejhardeman@jonesday.com
JONES DAY
3 Park Plaza, Suite 1100
Irvine, CA 92614
Telephone: (949) 851-3939
Facsimile: (949) 553-7539

Attorneys for Defendant
EXPERIAN INFORMATION SOLUTIONS,
INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HEIDI GITTERMAN,

Plaintiff,

v.

**EXPERIAN INFORMATION
SOLUTIONS, INC.,**

Defendant.

Case No. CV-09-05382 RS

**STIPULATION TO EXTEND
DEADLINES AND [PROPOSED]
ORDER**

[LOCAL RULE 6-1]

Plaintiff Heidi Gitterman ("Plaintiff") and Defendant Experian Information Solutions, Inc. ("Experian"), by and through their respective attorneys of record, hereby STIPULATE to modify the Court's Case Management Scheduling Order (Docket No. 27) to extend the deadline for completion of non-expert discovery from March 15, 2011, by sixty days, to May 14, 2011.

Good cause exists to extend the discovery deadline because the parties' counsel were unable to coordinate written discovery and depositions due to scheduling conflicts with their respective counsel. Daniel Dobrygowski, Experian's former attorney in this case, has recently left the law firm of Experian's counsel, Jones Day, and was also unavailable to coordinate discovery at the beginning of this year after his wife gave birth. In addition, Plaintiff's attorney Christopher Saldaña was involved in two trials in southern California lasting approximately two months at the beginning of this year. This is the first request by the parties to extend the pre-trial deadlines in this case, and the parties submit that all non-expert discovery will be completed on or

1 before May 14, 2011.

2
3 Dated: March 1, 2011

JONES DAY

4
5 By: /s/ Eric J. Hardeman
Eric J. Hardeman

6 Attorneys for Defendant
7 EXPERIAN INFORMATION SOLUTIONS,
INC.

8
9 Dated: March 1, 2011


SHEWRY & VAN DYKE, LLP

10
11 By: /s/ Christopher C. Saldaña
Christopher C. Saldaña

12 Attorneys for Plaintiff
13 HEIDI GITTERMAN

14
15
16 IT IS SO ORDERED.

17 Dated: 3/2, 2011

18 
19 UNITED STATES DISTRICT JUDGE
20 NORTHERN DISTRICT OF CALIFORNIA
21
22
23
24
25
26
27
28